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May 27, 1999

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Office of the Secretary  
Federal Communications Commission  
Portals Building  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: DA 99-430  
BO Docket No. 99-11 ✓  
Telephone Service For Indians On Reservations

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Dear Commission:

My name is James L. Bradley. I am president and majority shareholder of United Native American Telecommunications, Inc. ("UNAT"), one of a select few majority Native American owned FCC- licensed interexchange carriers. I am a Tlingit Indian, and have worked in the telecommunications field since the 1960's. UNAT, the company I helped to found, has been providing telecommunications services to the Department of Defense for over seven years, and has recently begun to provide telecommunications services, through joint venture agreements, with Native villages in Alaska.

UNAT believes that the problems plaguing the Native American telecommunications infrastructure are self-evident. Many Native American reservations are located in remote areas of the country. These reservations often encompass rough terrain over which it is difficult and expensive to construct a telecommunications infrastructure. Moreover, the sparse target population scattered across this rough terrain possesses limited economic means and technical knowledge. Many of these proposed new customers have never made a telephone call, let alone had telephone service.

Clearly, even though providing access to the reservations would be a major accomplishment, it would only be a partial solution. Instruction on the use, and uses, of telecommunications services would also be required.\*

Consequently, UNAT believes that the following should be required as a part of any program:

- 1) Promote Tribal Telecommunications Self-Sufficiency. It is evident from the testimony of industry witnesses that although they would like to assist in reservation telephony, this issue is not an important one to them. Also, tribal

\* In order for most of these new customers to take advantage of the more advanced telecommunications services, such as Internet access, further infrastructure, such as electrification, would need to be provided as well.

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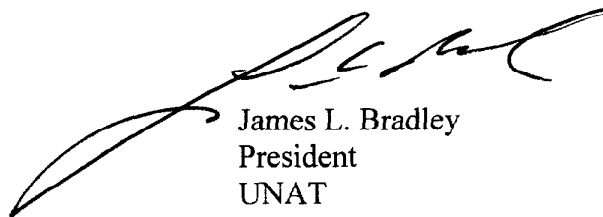
witnesses testified that current reservation customers were not being well served. Since Native American reservations do not fall within the jurisdiction of state commissions, it is paramount that the Commission promote tribal telecommunications self-sufficiency by assisting tribes to create their own on-reservation telecommunications providers whenever possible.

2) Require Wireless and Satellite Participation. As stated earlier, many reservations encompass rough terrain over which it is economically unfeasible to run traditional wire communications. Therefore, it is important for the Commission to require wireless and satellite carriers to work with tribes within a particular carrier's service area to provide, at a minimum, wireless and/or satellite Lifeline and Link-Up service to reservations.

3) Identify Existing Rights-of-Way. Testimony from several of the Indian tribes indicated that existing communications rights-of-way were in close proximity to, if not on, many reservations. Additional testimony also indicated that obtaining new rights-of-way was a cumbersome, bureaucratic, and time-consuming problem. Therefore, the Commission should work with the Indian tribes as well as the Bureau of Indian Affairs to locate existing communications rights-of-way on reservations.

In closing, UNAT fully agrees with the testimony from several of the Native American witnesses that as part of its trust responsibility to Native America, the federal government must provide basic telecommunications service to reservations. Should the Commission further information or assistance from UNAT, please feel free to contact me.

Sincerely,



James L. Bradley  
President  
UNAT

## **COMPANY HISTORY**

*Founded in 1992, United Native American Telecommunications, Inc. (UNAT) is a privately held company dedicated to providing high quality cost-effective telecommunications to its customers. Since its inception, UNAT has been awarded over 258 contracts with total sales in excess of \$30 million. UNAT's progressive approach to management and operations ensures the success of these projects, earning the company a solid reputation for providing innovative engineering solutions to complex business communications problems.*

*UNAT operates as a Public Utility for Intra-State and Intra-LATA service, and is licensed by the FCC as an interstate long distance carrier with the authority to do business with and provide services to the Department of Defense. UNAT's unique status as a Native American company operating as a common carrier in the United States provides the company with a competitive edge in both government and rural markets. In short, UNAT is poised to take full advantage of emerging trends in the telecommunications industry which will open new markets in the Northwest, across the United States and around the world.*

## **CORPORATE STRUCTURE**

*Understanding the ever-changing demands of the telecommunications market and the concurrent need for flexibility, UNAT has maintained a lean corporate structure. Directed by a high caliber executive management team, the company builds project teams on a contract by contract basis. The management team out-sources whenever possible, leases or subcontracts where appropriate, and operates through alliances, partnerships and networks to conserve dollars and reduce overhead costs. Management maintains direct communications with project teams assembled from a wide area of expertise in direct response to our customer's needs. The value of this management approach is confirmed by our customers who have been well served by the teams designed specifically for their projects who are focused solely on accomplishing that project's goals.*

## **SERVICES**

*UNAT offers innovative network engineering design, project management, network construction and installation, and ongoing service to its clients. Since its inception, UNAT has provided and installed narrow and wide bandwidth data, voice, and video networks, equipment, and circuits in both domestic and international markets. UNAT's approach to system design is innovative and flexible, ensuring our customers the best possible solution to their communications engineering needs. Unlike competitors who are often tied to a specific proprietary product line, UNAT is meticulous in researching the best combination of available technology to meet the customer's needs.*

*Additionally, UNAT provides on-going line service and support for a well-established portfolio of commercial and governmental clients. UNAT furnishes a unique package of circuit configuration and data transmission, daily management, troubleshooting, billing, and problem resolution services for each of these contracts. Our customers receive experienced technical support on a toll-free 24-hour trouble line, ensuring immediate response to any technical difficulty.*

*In order to better serve its customers, UNAT has built a professional marketing team with over 60 years of experience in Alaskan telecommunications. This team is responsible for the on-going sales of high quality products which support our customers growing communications needs.*

## **SUMMARY**

*United Native American Telecommunications, Inc. is a rapidly growing telecommunications company with a commitment to providing quality service to its clients. The company features an open management structure that allows for rapid response to changing market demands with very low overhead costs. Our products are price competitive and, at the same time, meet or exceed market standards for performance and reliability. UNAT is uniquely qualified to take advantage of opportunities in the governmental and remote commercial markets and has established the framework necessary to support growth in these areas.*



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## ***Corporate Profile***

*Effective Telecommunications  
for a Changing World*



***United Native American Telecommunications, Inc***

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# **United Native American Telecommunications, Inc.**

## ***Licenses, Certification & Reference Information***

- ***State of Incorporation – Washington – May 1992***
- ***SIC Code – 4813 – Telephone Communications***
- ***Commercial and Government entity (CAGE) Code – OWEC7***
- ***Federal Employer's Identification Number (EIN) – 91-1557411***
- ***WA UBI – 601-388-422***
- ***International Telecommunications Certificate Global Facilities Based/Global Resale***  
***Service No: ITC-214-19980930-00667***
- ***WA Utilities & Transportation Commission (UTC) number – 920836***
- ***Dunn & Bradstreet No. - 80-303-2820***
- ***BELCORE Identification Numbers***
  - ***FDG Access Code No. - 10196***
  - ***CIC No. - 196***
  - ***ACNA – UNA***
- ***NECA TRS Company Code No. - 801429***
- ***Alaska Business License No. - BL174116***
- ***Alaska Department of Commerce No. - 52397-F***
- ***Alaska Public Utilities Commission Certifications as a***  
***Telecommunications Service (intrastate Interexchange)***  
***Dated December 1, 1998***
- ***DITCO, BOA, DCA contract No. - DCA200-96-H-0039***
- ***Certified Minority Disadvantaged Business Enterprise***  
***SDB TRACKING NUMBER WA00001-0000765***